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Cavalry SPV I, LLC
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8
9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**
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12 ANTONIO B. CARREON,

13 Plaintiff,

14 vs.
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16 CAVALRY SPV I, LLC,

17 Defendant.
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CASE NO.: 2:17-cv-1953

NOTICE OF REMOVAL

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

2 PLEASE TAKE NOTICE that defendant Cavalry SPV I, LLC (“Defendant”)
3 hereby removes to this Court the state court action described below.

4 1. On December 14, 2016, a small claims complaint was filed against
5 Defendant by plaintiff Antonio B. Carreon (“Plaintiff”), in an action pending in
6 Superior Court of the State of California in and for the County of Los Angeles,
7 entitled *Antonio B. Carreon v. Cavalry SPV I, LLC*, Case No. 16DWSC07740. A
8 copy of the state court small claims complaint (“Complaint”) is attached hereto as
9 **Exhibit A.**

10 2. This removal petition is timely under 28 U.S.C. § 1446(b) because
11 Defendant was served on February 28, 2017.

12 3. This action is a civil action of which this Court has original jurisdiction
13 under 28 U.S.C. § 1331 and which may be removed to this Court by Defendant
14 pursuant to the provisions of 28 U.S.C. § 1441(a), because the Complaint asserts
15 claims against Defendant arising under 15 U.S.C. §§ 1692, *et seq.* (the “Fair Debt
16 Collection Practices Act”). *See* Ex. A at ¶ 3.

17 4. As the Complaint was filed in the Superior Court of the State of
18 California, County of Los Angeles, venue in this District Court is proper. *See* 28
19 U.S.C. § 1441(a) (providing for removal “to the district court of the United States for
20 the district and division embracing the place” where the state court action is
21 pending); 28 U.S.C. § 84(c)(2) (The Central District, Western Division comprises the
22 counties of, *inter alia*, Los Angeles).

23 5. Defendant is represented by the undersigned.

24 DATED: March 10, 2017

SIMMONDS & NARITA LLP
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JENNIFER L. YAZDI

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27 By: s/Jennifer Yazdi
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28 Cavalry SPV I, LLC